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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the matter of:

William Wallace Richardson II  
(Your Full Name)  
COMPLAINANT

Case 2004-00057

VS.

Columbia Gas of Kentucky, Inc.  
(Name of Utility)  
DEFENDANT

**RECEIVED**

FEB 06 2004

**PUBLIC SERVICE  
COMMISSION**

COMPLAINT

The complaint of William Wallace Richardson II respectfully shows:  
(Your Full Name)

(a) \_\_\_\_\_  
(Your Full Name)

3012 Shaker Run Circle, Lexington, KY 40509  
(Your Address)

(b) Columbia Gas of Kentucky, Inc  
(Name of Utility)

2001 Mercer Road, Lexington KY 40511  
(Address of Utility)

(c) That: The defendant, Columbia Gas of Kentucky, Inc.  
(Describe here, attaching additional sheets if necessary.)

overcharged the complainant, William W. Richardson, for  
the specific act, fully and clearly, or facts that are the reason

a service line extension at 1299 Standish Way, Lexington KY  
and basis for the complaint.)

40504. The \$815 paid by the complainant violates the  
Public Utilities Commission's approved tariff for the defendant.

Continued on Next Page

Formal Complaint

William Wallace Richardson II vs. Columbia Gas of Kentucky, Inc.

Page 2 of 2

Exhibit 'A' as provided by the complainant outlines  
the basis for this claim.

Wherefore, complainant asks for full refund of the \$815  
(Specifically state the relief desired.)

service line extension charge and review of the  
above referenced sections of the defendant's tariff.

Dated at Lexington, Kentucky, this 15<sup>th</sup> day  
(Your City)

of December, 19 2003.  
(Month)

William Wallace Richardson II  
(Your Signature)

(Name and address of attorney, if any)

## Exhibit A

The defendant, Columbia Gas of Kentucky, Inc, overcharged the complainant, William W. Richardson, for a service line extension at 1299 Standish Way, Lexington, KY 40504. Under the Public Utilities Commission's operational tariff for the defendant, accepted March 1, 2003, the complainant is categorized as a new residential customer with a service line of 100 feet or less, who is not using natural gas as its "primary energy source." The complainant was charged \$815 for a new service extension. The defendant's tariff (sheet no. 62) states: "[new customers] will be required to contribute a portion of the cost of the service in the form of a contribution in aid of construction." Furthermore, "The amount will vary depending upon the installed appliances but will not exceed the Company's annual average cost of a service line." This annual cost is \$815, as outlined on sheet 62a of the tariff.

The complainant will have installed natural gas appliances capable of generating at least 110,000 BTU's on a year-round basis. This includes a 60,000 BTU stovetop, a 50,000 BTU grill, and a 65,000 BTU fireplace. (As a comparison, new customers, with no-charge service lines, and who use natural gas as "a primary energy source," have furnaces that generate, on average, 69,000 BTU's—winter months only.) The defendant is violating the approved tariff on two counts: 1) The complainant was not asked to pay a "[portion of] the average annual cost of a service line"; rather, the complainant was charged the full amount, and 2) The amount did not "vary depending on the installed appliances."

The complainant will likely consume a volume of natural gas in excess of customers who use natural gas as a "primary energy source" as defined in the tariff. In addition, the plaintiff would like reviewed the "invasion of privacy" issues surrounding the defendant's right to inspect new customers' installed appliances.

**COLUMBIA GAS OF KENTUCKY, INC.**

**GENERAL TERMS, CONDITIONS, RULES AND REGULATIONS**

(Continued)

**10. EXTENSION OF DISTRIBUTION MAIN - (Continued)**

to the distribution main extension who will utilize gas for base load purposes and as the major source of energy. The classification of Customer shall be determined by Company at the time Customer is connected to the distribution main extension. No refunds shall be paid after the expiration of ten (10) years from the date of the agreement.

Where a distribution main extension of more than one hundred (100) feet is requested for commercial or industrial purposes and all or part of such distribution main extension is not deemed economically justified at Company's expense, based on a cost-benefit study, Company shall require the applicant or applicants to provide a contribution in aid of construction and/or enter into a line extension agreement and contribute or deposit with Company the estimated cost of that portion of the distribution main extension which is not deemed economically justified at Company's expense, based on such study. The line extension agreement deposit will be refunded annually, based upon the incremental volumes, if any, sold directly from the distribution main extension which are over and above those volumes used to determine the portion of the distribution main extension to be done at Company's expense. The refund shall be determined by multiplying such incremental volumes by the applicable base rates. No refunds shall be paid after the expiration of ten (10) years from the date of the agreement.

In no case shall the total of refunds exceed the amount deposited for the distribution main extension. Deposits will not draw interest. All distribution main extensions shall be the property of Company.

Where a distribution main extension is deemed economically justified at Company's expense, based upon a cost-benefit study, no deposit shall be required.

**11. EXTENSION OF SERVICE LINES**

When Company initiates service to a new Residential or Commercial Customer, Company will install, own, operate and maintain the service line at the premises of Residential and Commercial Customers, if such premises are not connected to a Company main by a service line.

With respect to Residential and Commercial Customers that occupy premises already connected to a Company main by a service line, Company shall be responsible for operating and maintaining the Customer Service Line, and when Company determines that replacement of such Customer Service Lines is necessary, Company shall be responsible for installing the service line, and shall thereafter own the service line. If it becomes necessary for Company to replace a service line, Company shall use its best efforts to replace the line, during normal working hours and as soon as practical, after Company is made aware of the need for the replacement of the service line.

When the length of the service line required between the property line and the meter is 100 feet or less, and the customer has agreed to use natural gas as its major source of energy, Company will assess no charge for the service line installation. A customer's major source of energy is defined as its primary energy source for heating the premises. If the customer is not using natural gas as its major energy source, customer will be required to contribute a portion of the cost of the service line in the form of a contribution in aid of construction. This amount will vary depending upon the installed appliances but will not exceed the Company's annual average cost of a service line.

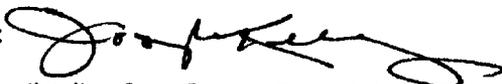
When the length of required service line exceeds the 100 feet, Company may require Customer to contribute toward the cost of the service line installation an amount equal to the estimated cost per foot for each lineal foot of service line beyond the 100 feet. Contributions by

PUBLIC SERVICE COMMISSION  
OF KENTUCKY  
EFFECTIVE

DATE OF ISSUE: January 30, 2003

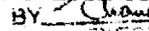
DATE EFFECTIVE: March 10, 2003

Issued by:



PURSUANT TO SECTION 9 (1)  
Vice President

Issued by authority of an Order of the Public Service Commission in Case No. 2002-00145 Dated December 13, 2002

BY:  EXECUTIVE DIRECTOR

**GENERAL TERMS, CONDITIONS, RULES AND REGULATIONS**  
(Continued)

11. **EXTENSION OF SERVICE LINES (continued)**

Company's average annual cost of a service line in 2002 equals \$815.

Calculated as:

Cost of service lines installed in 2002 divided by number of lines equals  
average annual cost

$$\$1,168,915 / 1435 = \$815$$

PUBLIC SERVICE COMMISSION  
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EFFECTIVE

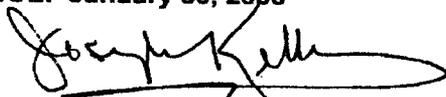
MAR 01 2003

PURSUANT TO ORDER NO. 2002-00145  
SEP 17 2002

DATE OF ISSUE: January 30, 2003

DATE EFFECTIVE: March 1, 2003

Issued by:



Vice President

Issued by authority of an Order of the Public Service Commission in Case No. 2002-00145 dated December 13, 2002